

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

CORNELIUS HILL	:	
and	:	
TRUDIE HASTINGS HILL H/W	:	
Plaintiffs	:	
SCHIFFFAHRTSGESELLSCHAFT MS	:	NO. 02-CV-2713
PRIWALL mbH & Co. KG	:	
and	:	
REEDEREI F. LAEISZ G.m.b.h., ROSTOCK	:	
Defendants	:	JURY TRIAL DEMANDED

ORDER

AND NOW, this day of , 2004, it is hereby ORDERED
and DECREED that defendants' Motion in Limine to preclude the testimony of plaintiffs'
liability expert, Captain Joseph Ahlstrom, for lack of relevant expertise is GRANTED. Captain
Ahlstrom will not be permitted to testify as an expert in the field of stevedoring operations.

BY THE COURT:

J.

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

CORNELIUS HILL	:	
and	:	
TRUDIE HASTINGS HILL H/W	:	
Plaintiffs	:	
SCHIFFAHRTSGESELLSCHAFT MS	:	NO. 02-CV-2713
PRIWALL mbH & Co. KG	:	
and	:	
REEDEREI F. LAEISZ G.m.b.h., ROSTOCK	:	
Defendants	:	JURY TRIAL DEMANDED

**MOTION IN LIMINE TO PRECLUDE TESTIMONY
OF PLAINTIFFS' LIABILITY EXPERT,
CAPTAIN JOSEPH AHLSTROM, FOR LACK OF RELEVANT EXPERTISE**

Defendants Schiffahrtsgesellschaft MS Priwall mbH & Co. KG ("Priwall") and Reederei F. Laeisz G.m.b.h., Rostock ("Laeisz"), by and through their attorneys, Rawle & Henderson, hereby move in limine to preclude the testimony of plaintiffs' liability expert for lack of relevant expertise, and, in support thereof, assert as follows:

1. In addition to the reasons cited in defendants' prior Motion to Preclude the Testimony of Plaintiffs' Liability Expert, Captain Joseph Ahlstrom, defendants move to preclude his testimony on the additional ground that his purported area of expertise, sailing a vessel, is totally irrelevant to the duties and issues involved in the instant case which requires stevedoring expertise.
2. The liability issues in the instant case involve the duties and obligations a vessel owner owes to the employees of an experienced and expert stevedore once discharge operations have begun.
3. Plaintiffs' liability expert does not have any experience and/or expertise in the field of stevedoring operations and, therefore, his testimony should be excluded.

WHEREFORE, defendants respectfully request that this Honorable Court grant their Motion in Limine and preclude Captain Ahlstrom from testifying as an expert in stevedore operations.

Respectfully submitted,

RAWLE & HENDERSON ^{LLP}

A handwritten signature in black ink, appearing to read "Carl D. Buchholz, III". The signature is stylized with a large, looped "C" and a long, trailing "z" at the end.

By: _____

Carl D. Buchholz, III, Esquire
Attorney for Defendants,
Schiffahrtsgesellschaft MS Priwall
mbH & Co. KG and Reederei F.
Laeisz G.m.b.h., Rostock

The Widener Building
One South Penn Square
Philadelphia, PA 19107
Phone: (215) 575-4200.

DATED: March 4, 2004

CERTIFICATE OF SERVICE

I, Carl D. Buchholz, III, Esquire, do hereby certify that a copy of the foregoing Motion *in Limine* been served via Hand Delivery to the following of record:

Alfred Smith, Esquire
Alfred Smith & Associates
1333 Race Street, 2nd Floor
Philadelphia, PA 19107
(Attorneys for Plaintiff Cornelius Hill)

A handwritten signature in black ink, reading "Carl D. Buchholz III". The signature is written in a cursive, flowing style with a large, stylized "C" and "B".

Carl D. Buchholz, III, Esquire

Dated: March 4, 2004